

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

LAVELLE WILLIAMS,

Defendant.

Case: 2:24-cr-20584

Assigned To : Lawson, David M.

Referral Judge: Patti, Anthony P.

Assign. Date : 10/15/2024

Description: IND USA V. LAVELLE WILLIAMS (AB)

Violations: 18 U.S.C. §1951(a)
18 U.S.C. §924(c)(1)(A)
18 U.S.C. §922(g)(1)

INDICTMENT

The Grand Jury charges:

COUNT ONE

18 U.S.C. §1951(a)

Interference with Commerce by Robbery

On or about September 2, 2024, in the Eastern District of Michigan, Southern Division, the defendant, LAVELLE WILLIAMS, unlawfully obstructed, delayed, and affected interstate commerce, and the movement of articles and commodities in such commerce, by robbery of a Family Dollar retail store, in that defendant LAVELLE WILLIAMS unlawfully took a bag of charcoal from the presence of a store employee and against the employee's will by means of actual and threatened force, violence, and

fear of injury, to the employee, all in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

18 U.S.C. §924(c)

*Use, Carry, and Discharge of a Firearm During
and in Relation to a Crime of Violence*

On or about September 2, 2024, in the Eastern District of Michigan, Southern Division, the defendant, LAVELLE WILLIAMS, knowingly used and carried, and discharged a firearm, during and in relation to the commission of a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, as alleged in Count One of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

18 U.S.C. §922(g)(1)

Felon in Possession of a Firearm

On or about September 2, 2024, in the Eastern District of Michigan, Southern Division, the defendant, LAVELLE WILLIAMS, knowing that he had been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, one Clerke Tech, Model RL22, .22 caliber firearm, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

18 U.S.C. § 924(d), 18 U.S.C. § 981, and 28 U.S.C. § 2461

1. The allegations contained in Counts One through Three of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d) and Title 18, United States Code, Section 981(a)(1)(C), together with Title 28, United States Code, Section 2461.

2. Upon conviction of the offenses charged in Counts One, Two, and/or Three of this Indictment, defendant LAVELLE WILLIAMS shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461, any firearm and ammunition involved in or used in defendant's knowing violation of the offense, including, but not limited to the following:

- One Clerke Tech, Model RL22, .22 caliber firearm and associated ammunition.

3. Upon conviction of the offense(s) charged in Count One of this Indictment, defendant shall forfeit to the United States any property which constitutes or is derived from proceeds traceable to the offense(s), pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/Craig Wininger
CRAIG WININGER
Chief, Violent and Organized Crime Unit

s/Jeanine Brunson
JEANINE BRUNSON
Assistant U.S. Attorney

Dated: October 15, 2024

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United States District Court Eastern District of Michigan	Criminal Case Cover Sheet
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4)¹:	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: J.B.

Case Title: USA v. Lavelle Williams**County where offense occurred:** Wayne**Offense Type:** Felony**Indictment -- prior complaint [Case No. 24-MJ-30402]****Superseding Case Information****Superseding to Case No:** _____ **Judge:** _____**Reason:****Defendant Name****Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case**October 15, 2024

Date



Jeanine Brunson
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
Jeanine.Brunson@usdoj.gov
(313) 226-9597
Bar #: P55429

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.